

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR 20 DEPOSITION ANSWERS
1C FOR DEFENDANT ROBERT GRAY
PURSUANT TO FED R. CIV P # 30(A)(2)
IN ACCORDANCE TO THE HONORABLE JUDGE
GREGORY M. SLEETS' FEB 21, 07 ~~MEMORANDUM~~
MEMORANDUM P. 8

DATE : 3/12/07



Jimmie Lewis
SB1 # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) ROBERT GRAY WHAT IS YOUR SPECIFIC ACCOUNT OF WHAT OCCURED AT THE D.P.C MITCHELL BUILDINGS DINNING HALL ON 6/14/04 AT OR ABOUT 8:00 P.M., REGARDING THE PLAINTIFF JIMMIE LEWIS
- 2.) ROBERT GRAY WHO WERE THE D.P.C PERSONEL THAT ESCORTED THE PLAINTIFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 8:00 P.M
- 3.) ROBERT GRAY WHAT IS THE DISCRPTION OF YOUR JOB DUTIES.
- 4.) ~~MA~~ ROBERT GRAY HAVE YOU EVER HAD TO UTILIZE FORCE ON A PATIENT AT THE D.P.C

5.) ROBERT GRAY WHILE DR. FOSTER
WAS EMPLOYED AT THE D.P.C
DATING 5/21/04 TO 6/25/04
DID SHE HAVE THE AUTHORITY
TO ORDER YOU TO UTILIZE FORCE
ON A PATIENT

6.) ROBERT GRAY HAVE YOU EVER
FILED GRIEVANCE(S) REGARDING
THE DISCRPTION OF YOUR
JOB DUTIES AT THE D.P.C

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 12TH, DAY OF MARCH,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR 20 DEPOSITION ANSWERS
1 C FOR DEFENDANT ROBERT GRAY PURSUANT
TO FED R. CIV. P # 30(A)(2) IN ACCORDANCE TO
THE HONORABLE JUDGE GREGORY M. SLEETS' FEB 21, 07
ORDER, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

DATE: 3/12/07

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INM: Timmie Lewis
SBI# 506622 UNIT D42
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE
19801

